

Exhibit 3

Hang Le

From: Diana Esquivel <Diana.Esquivel@doj.ca.gov>
Sent: Monday, April 7, 2025 6:57 PM
To: Hang Le; Amy R. Margolies; Shannon Gustafson
Cc: Dale Galipo; Santiago Laurel
Subject: RE: L.C., et al. v. State of California, et al. - State Defs' MILs

Good afternoon,

State Defs intend to file the following MILs:

1. Exclude testimony of any witness who opined that Puga was scared or having other emotion
2. Limit photos of Puga's body and exclude all autopsy photos
3. Exclude evidence of other lawsuits or complaints filed against Defendants
4. Exclude Kimmin's testimony and video re bullet count, and if necessary, exclude his commentary in compilation video (*see* No. 5 in next section below)
5. Limit Dr. Jong's testimony to findings and opinions stated in his report and exclude any opinion not included in his report, including those opinions based on hypothetical scenarios

State Defs request that the parties stipulate to the exclusion of the following issues to avoid filing a MIL (including seeking leave to file add'l MILs):

1. Exclude evidence of the Botten injuries
2. Exclude evidence of the State and County's indemnification of an adverse verdict
3. Exclude "Sal" surveillance video
4. Exclude evidence of Antonia Salas Ubaldo's wrongful death damages
5. Exclude Kimmin's commentary in compilation video
6. Exclude Roger Clark's opinions re ultimate facts
7. Exclude evidence of Plaintiffs' funeral/burial expenses

Thanks,

-Diana

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Subject: L.C., et al. v. State of California, et al. - Plaintiffs' MILs

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Counsel,

Below please find Plaintiffs' contemplated Motions in Limine in the *L.C., et al. v. State of California, et al.* case.

1. MIL to exclude Puga's criminal history and prior contacts with law enforcement
2. MIL to exclude Mr. Puga's prior alleged drug and alcohol use and use of drugs/alcohol on the day of the incident, including the toxicology report
3. MIL to exclude allegations of Mr. Puga's affiliation or membership with a gang
4. MIL to exclude evidence/documents produced after the fact discovery cutoff
5. MIL to exclude certain opinions from Defendants' police practices experts
 - a. Greg Meyer
 - i. Forensic analysis of videos: that Puga had a gun in his waistband when he was exiting the vehicle and he had a gun in his hand while he was running
 - ii. Action-reaction time
 - iii. Rebuttal opinions to Matthew Kimmins videos
 - iv. Speculation regarding what officers perceived after Puga fell to the ground
 - b. Kenneth Hubbs
 - i. Hector's actions were consistent with chronic drug abuse
 - ii. Hector's actions on February 17, 2021 are consistent with suicide by cop
 - iii. Puga was a dangerous career criminal (and recitation of his criminal history that as unknown to the officers)
 - iv. Assessment that Puga was attempting to manipulate the officers and deputies into a position where he could ambush and shoot the officers and deputies
 - v. Conclusion that Puga was preparing for a gunfight and planned to go down with gunfire to avoid being sent back to prison
 - vi. Speculation that Puga may have fired as many as five rounds during the incident

Best,
Hang

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